

Draft refreshed GB INNS strategy 2022-2030: request for written comments

Wildlife and Countryside Link Response – June 2022

Wildlife and Countryside Link is a coalition of 65 organisations working for the protection of nature. Together we have the support of over eight million people in the UK and directly protect over 750,000 hectares of land and 800 miles of coastline.

This response is supported by the following Link members:

- Amphibian and Reptile Conservation
- Angling Trust
- Buglife
- RSPCA
- The Wildlife Trusts
- Woodland Trust

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Wildlife and Countryside Link welcome this opportunity to provide comment on the draft refreshed GB INNS Strategy 2022-2030.

Invasive non-native species (INNS) are animals, plants or other organisms that have been introduced to places where they do not occur naturally, through deliberate or accidental human actions, causing negative environmental, social and/or economic impacts in those areas. INNS are one of the top five drivers of biodiversity loss and species extinction globally, implicated in 58% of the 247 global animal extinctions where the cause of extinction is known.^{1 2} They are also estimated to cost the UK economy at least £2 billion each year.³ These impacts will only increase as more species become introduced and established in the UK, further exacerbated by the effects of climate change⁴

The negative impacts of INNS within the UK are significant and growing. As such, it is vital that the GB INNS Strategy for 2022-2030 drives strategic action for the prevention, eradication and management of INNS, to address both the increasing threat and the continuing negative impacts of established INNS.

¹ IPBES Global Assessment, 2019 - <https://ipbes.net/global-assessment-report-biodiversity-ecosystem-services>

² Bellard C, et al. (2016). Alien species as a driver of recent extinctions. *Biology Letters*, 12: 20150623

³ Wildlife and Countryside Link, 2020 -

https://www.wcl.org.uk/docs/Prevention_is_Better_than_Cure_Report_2020.pdf

⁴ JNCC Biodiversity Indicators, 2021 - <https://jncc.gov.uk/our-work/uk-biodiversity-indicators-2021/>

We therefore offer the following recommendations for how the draft strategy could be further improved:

- Ensure that targets throughout the strategy are SMART - specific; measurable; achievable, realistic and timely.
- Focus on prevention, including a significant increase in resources to enable effective action and more frequent surveillance for emerging threats.
- Provide further detail on mechanisms for delivery of aims and objectives, with clear timeframes.
- Give stronger direction on funding for all aspects of the strategy, including research, delivery and coordination, but particularly prevention.
- Broaden the scope to include all invasive non-native organisms and pathways.
- Commit to more ambitious engagement and awareness raising with the public, and other stakeholders.

Strong timebound targets to drive action

- The strategy must set strong targets with a clear timeframe for their delivery, including robust interim targets up to 2030

When reviewing the GB INNS Strategy 2015-2020, we highlighted that many of the objectives were not underpinned with strict timeframes or targets, making it difficult to assess progress. Indeed, we reflected that this meant many of the objectives could simply be carried over from one strategy to another, regardless of their success – or failure.

The current draft of the 2022-2030 strategy raises the same concerns. The strategy currently lacks a timeframe with key milestones for delivering actions, meaning that there is no date to measure the actions against, other than the end of the strategy. There are a limited number of targets that are measurable and time-based. This is of particular relevance – and concern – with regards to Chapter 9.2 ‘Regulation and Enforcement’, to ensure that the carry-over of IAS is fit for purpose in GB in the wake of the proposed ‘Brexit Freedoms Bill’.

Furthermore, without clear timeframes and targets, the strategy risks failing to drive the necessary action and ambition to tackle the threats posed by INNS. The previous strategy aimed to ‘improve coordination’ and to ensure that ‘strategic action’ on INNS is ‘adequately resourced’. Yet the need for a strategic approach to the management, control and prevention of INNS is still not well recognised or implemented across Government and its regulatory bodies. For example, the recent Ofwat Green Recovery Fund saw bids from water company United Utilities for a project for the strategic control of INNS. Yet this was rejected by Ofwat on the grounds that though water companies must manage INNS on their own land, they believed a role in coordination or wider delivery would be beyond their remit. Indeed, this draft strategy has no reference to the Environmental Principles Policy Statement, Environment Act, 25-Year Environment Plan, or Levelling Up agenda, despite INNS prevention and management having an important role to play across these policies.

Without clear timeframes and targets to drive progress, the failures of the previous strategy will simply perpetuate. Ambition should be strengthened throughout the draft.

A further example of where stronger targets to drive action are needed is under rapid response. The current draft does not include a clear, time-based target for rapid response or eradication. Actions such as ‘Instigate and carry out rapid response eradications for GB priority species.’ should be

amended to include deadlines and measurable detail – for example, a percentage of newly arrived species eradicated by 2030. All targets should adhere to SMART principles - specific; measurable; achievable, realistic and timely.

A clear focus on prevention

- Prevention must be given priority with (i) a significant increase in resources to enable effective action; and (ii) more frequent scanning/surveillance for emerging threats

We know that prevention is even more critical than management and eradication in tackling the threats posed by invasive non-native species. As we set out in our 2020 report ‘Prevention is Better Than Cure’, this is not only more cost and resource efficient, but also more effective at reducing negative impacts on native biodiversity.⁵

The 2022-2030 strategy should therefore place a stronger focus on prevention. As the strategy itself states, 10-12 new INNS become established in GB each year. The number of INNS established in Great Britain has grown consistently since 1960.⁶ The draft strategy states that INNS prevention will be achieved through the implementation of Pathway Action Plans (PAPs), inspections at the border for priority species, continued horizon scanning, and developing expertise and capacity for delivering contingency responses. However, INNS biosecurity is severely under-funded and under-resourced. Expenditure on control of established invasive species is estimated at £9.85 million per annum, roughly ten times the expenditure on INNS biosecurity.⁷ In 2020, INNS received just 0.4% (£922k) of the UK biosecurity budget, and was the only UK biosecurity department without a dedicated inspectorate. Though a 3-year trial for an inspectorate has now been secured, this is not guaranteed to continue to exist beyond the trial. The inspectorate also requires stronger powers in order to carry out inspections at the border; without this, its efficacy is undermined.

The new strategy should provide greater detail on how it will resource and deliver this key outcome for prevention. As per the recommendation of the Environmental Audit Committee (EAC) in 2019, the invasive species biosecurity budget should be tripled to £3 million, and a further £3 million should also be provided to fund the dedicated invasive species inspectorate.⁸ This investment would reduce the number of new establishments by 50-67% and provide a return of investment of £23 for every £1 spent.⁹

Additionally, the draft strategy states that a key action for the prevention of INNS is to ‘continue to undertake horizon scanning of emerging threats every 5 years, involving a broad range of stakeholders’. Given that 10-12 new INNS become established in GB each year, 5-yearly cycles do not feel frequent enough. Horizon scanning should ideally be carried out annually, or at least biennially.

⁵ Wildlife and Countryside Link, 2020 -

[https://www.wcl.org.uk/docs/Prevention is Better than Cure Report 2020.pdf](https://www.wcl.org.uk/docs/Prevention%20is%20Better%20than%20Cure%20Report%202020.pdf)

⁶ JNCC Biodiversity Indicators, 2021 - <https://jncc.gov.uk/our-work/uk-biodiversity-indicators-2021/>

⁷ Wildlife and Countryside Link. (2020). ‘Prevention is Better Than Cure’.

[https://www.wcl.org.uk/docs/Prevention is Better than Cure Report 2020.pdf](https://www.wcl.org.uk/docs/Prevention%20is%20Better%20than%20Cure%20Report%202020.pdf)

⁸ EAC. (2019). ‘Invasive Species’.

<https://publications.parliament.uk/pa/cm201919/cmselect/cmenvaud/88/88.pdf>

⁹ Wildlife and Countryside Link. (2020). ‘Prevention is Better Than Cure’.

[https://www.wcl.org.uk/docs/Prevention is Better than Cure Report 2020.pdf](https://www.wcl.org.uk/docs/Prevention%20is%20Better%20than%20Cure%20Report%202020.pdf)

Further details on delivery

- The strategy must provide further detail on mechanisms for delivery of aims and objectives, clearly setting out how they will be achieved.

We are concerned that the evidenced strategic plan has not yet been published, given that this plan will be key to delivering objectives under the strategy. Without it, it is hard to critically assess the objectives and key aims. This is also a missed action of the previous strategy.

Further detail generally on how the objectives and actions within the strategy will be delivered would be welcome. For example, many of the actions within the strategy seem reliant on the delivery and success of Pathway Action Plans (PAPs). However, the PAPs are already late, and have yet to be completed, consulted on, and approved. It is therefore concerning that reliance on the PAPs could further delay much needed action to tackle INNS. The strategy must also do more to demonstrate confidence in the ability of the PAPs to deliver these objectives and actions. For example, the strategy must guarantee that the PAPs will be adequately resourced to deliver the desired outcomes.

Similarly, whilst prevention is rightly considered a priority within the strategy, this is not supported with details on the mechanisms for delivery. It therefore remains unclear how the strategy intends to achieve this.

Stronger direction on funding

- Give stronger direction on funding for all aspects of the strategy, including research, delivery and coordination.

There is currently a lack of direction on funding for all aspects of the strategy, including research, delivery and coordination.

INNS biosecurity is severely under-funded and under-resourced. The strategy should address this issue directly, setting out how targets will be achieved given resourcing constraints. Furthermore, as discussed, the current trial INNS inspectorate should be secured in the long-term and should be granted the necessary funding and powers in order to operate effectively – a tripling of the INNS biosecurity budget to at least £6 million.¹⁰

Required expenditure on control of established invasive species is estimated at £9.85 million per annum, roughly ten times the expenditure on INNS biosecurity.¹¹ These ongoing management costs often fall on the landowner or manager, and can be the constraining factor in effective catchment management. Government must take the lead on funding for INNS management, which must be accessible to landowners and managers – for example, as grants.

Broaden the scope to include all invasive non-native organisms and pathways

- The strategy must cover all invasive non-native organisms, and the pathways by which they become introduced to GB.

As stated, invasive non-native species (INNS) are animals, plants or *other organisms* introduced to places where they do not occur naturally, with negative consequences. However, the current draft

¹⁰ <https://www.wcl.org.uk/nature-invader-costs-to-economy-2020.asp>

¹¹ Wildlife and Countryside Link. (2020). 'Prevention is Better Than Cure'.

[https://www.wcl.org.uk/docs/Prevention is Better than Cure Report 2020.pdf](https://www.wcl.org.uk/docs/Prevention%20is%20Better%20than%20Cure%20Report%202020.pdf)

of the strategy specifically excludes bacteria and viruses, whilst including fungal, protozoan, metazoan or other pathogenic organisms. This means that, for example, while the causal agents of amphibian chytridiomycosis and crayfish plague are included, the causal agents of amphibian ranavirus and squirrel pox are not.

A further example is *Xylella*, a plant disease which can affect several species of broadleaved trees widely grown in the UK, such as oak, elm and plane, as well as a wide range of other commercially grown plants (e.g. grape, citrus and olive). It is caused by a bacterium called *Xylella fastidiosa* (*X. fastidiosa*). *Xylella* presents a major threat to a wide range of plants grown in the UK if established, with implications for the biodiversity and ecology of woodland and other habitats. Many of the plant species affected are grown commercially, thus bringing economic implications for our plant-based industries. *Xylella* is currently present in the wider environment in mainland Europe including in France, Spain and Italy. The UK government should be preventing *Xylella* (which has many host species including Olive trees which have previously posed major risk of entry) from reaching UK shores.

The presented scope of this strategy does not include measures to prevent *Xylella* from reaching the UK, even though it poses arguably the biggest threat to our nursery sector and wider environment currently known. The scope of the strategy should therefore be broadened, to include all non-native invasive organisms. This would enable a more joined up, holistic approach to tackling existing and forthcoming threats.

Furthermore, though a key component of the landscape for surveillance of pathogenic INNS, Defra's wildlife health surveillance partnership is not mentioned within the draft. We suggest this should be included within Chapters 3, 4, 7 and 10.

It is concerning that the draft strategy does not include international plant trade as a major pathway that must be acknowledged when considering risk of INNS entry and establishment. Government should commit to addressing and mitigating risk where possible, given that certain risks cannot be avoided. For example, we must see commitments to increased investment in the domestic nursery sector, to reduce the reliance on imported stock that has developed over the last 30 years. Indeed, since 1990, more than 20 serious tree pests and diseases have arrived into the UK. The recent interception of Pine Processionary Moth (which poses environmental and human health implications) is a stark reminder of the risk of imports and demonstrates no matter how much we invest in border infrastructure and trained personal, there is always a risk of INNS penetrating these safeguards. The single most effective measure UK government can implement to mitigate the risk of INNS entry with plant trade is to invest in our domestic sector and wherever possible reduce reliance on imports.

Greater ambition on engagement and awareness raising

- The strategy must be more ambitious on engagement and awareness raising with the public and other stakeholders.

We welcome that the draft strategy includes the need to build awareness of INNS amongst key sectors by clarifying legal requirements and attending trade shows, and to improve understanding of additional pathways (such as online sales). However, there is equally a strong need to extend this objective to the wider public, who also have a role to play and need to be equipped with the knowledge around INNS.

Invasive non-native species week is a good foundation for this, but we must be more ambitious with our commitment to educating the public on INNS. Government must lead a strong and robust public communications plan around INNS, starting with an explanation of what they are and why they pose a risk and including solutions relevant for the general public. Comms and awareness raising around INNS must acknowledge the critical importance of sustained public vigilance, the success of which has been shown with comms around the Asian hornet.

In doing so, there is also scope for far greater engagement with private companies and businesses. This could, for example, be of particular benefit when tackling the horticultural pathway; flagging to consumers when they are at risk of purchasing an invasive species, through labelling or working with online sellers to identify and remove invasive species for sale. The chapter on awareness raising in the draft strategy should include this.

The GBNNSS website is a fantastic resource, which could be utilised to even greater effect, if further developed into a hub for best practice. It is therefore welcome that the strategy includes Key Action 8.6 'Maintain, update and develop the NNSS website, building on the relaunch in April 2022, to ensure that it is user-friendly and up-to-date.' This could be further strengthened through explicit mention within the strategy of the provision of funding to ensure this maintenance can take place.